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February 25, 2021

VIA ECF

Hon. John G. Koeltl
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Application granted. The sentencing is
adjourned to May 3, 2021 at 10 a.m.

SO ORDERED.

New York, New York /s/ John G. Koeltl
March 1, 2021 John G. Koeltl, U.S.D.J.

Re: *United States v. Asim Hameedi, et al.*, No. 17 Cr. 137 (JGK)

Dear Judge Koeltl:

We write on behalf of defendant Asim Hameedi to respectfully request that the Court adjourn Dr. Hameedi's in-person sentencing hearing currently scheduled for March 22, 2021 (ECF Doc. 441), for one month. We make this request in light of the ongoing COVID-19 pandemic and in anticipation of continued improvement of the public health metrics in New York.

It is our understanding that although the courthouse is nominally open, most in-person proceedings still are not taking place due to the continued risks of COVID-19. There is no urgency to complete Dr. Hameedi's sentencing proceeding at this time. He has remained on bail without incident since his arrest; he presents no flight risk or danger to the community; and ordering an adjournment until parties and the Court may safely gather in person will not affect the Court's ability to justly sentence Dr. Hameedi. Furthermore, while the CARES Act permits sentencings to proceed by videoconference with the defendant's consent, Dr. Hameedi does not consent to waive his in-person appearance at his sentencing hearing where his very liberty is at stake. *See* CARES Act, Pub. L. No. 116-136, § 15002(b)(4), 134 Stat. 281, 528-29 (2020) (creating an exception to the general in-person appearance requirement but only upon the defendant's consent after consulting with counsel). Accordingly, we respectfully request that the Court adjourn the March 22, 2021 sentencing hearing for an additional month.

We further request that the Court adjourn the filing dates for supplement pre-sentencing submissions, if any, as follows: any supplemental submission from Dr. Hameedi's will be due 14 days prior to sentencing; and any supplemental submission from the government will be due 8 days prior to sentencing.¹

¹ Dr. Hameedi's supplemental sentencing submissions is presently due on February 26, 2021, and the government's submission is due on March 5, 2021. (ECF Doc. 441.) Our requested deadlines for any submissions are in line with the Court's Individual Rule § V.B.i, ii.

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We have conferred with counsel for the government (AUSA Abramowicz) who does not object to these requests.

Respectfully yours,

MEISTER SEELIG & FEIN LLP

/s/ IH

Henry E. Mazurek
Ilana Haramati

Counsel for Defendant Asim Hameedi

cc: Government Counsel (via ECF)